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March 3, 2020

Via CM/ECF Filing

Honorable Jerrold N. Poslusny, Jr. U.S.B.J.
United States Bankruptcy Court
400 Cooper Street
Camden, NJ 08101

Re: *In re Kline Construction Co., Inc.*

Case No. 19-25757

*Motion to Compel Payment of Administrative Expenses on behalf of South Jersey
Electrical Workers Temporary Disability Fund, IBEW Local 351 Joint Apprenticeship
and Training Committee, IBEW Local 351 Welfare Fund*

Hearing Date: March 10, 2020, 10:00 a.m.

Dear Judge Poslusny:

This firm represents the Trustee in the above-referenced bankruptcy case. Please accept this letter as a response on behalf of the Trustee to the Motion to Compel filed by South Jersey Electrical Workers Temporary Disability Fund, IBEW Local 351 Joint Apprenticeship and Training Committee, IBEW Local 351 Welfare Fund (the “Movants”).

Counsel to the Trustee and the Movants have been working toward a consent order that would provide the Movants with an allowed chapter 11 administrative expense. Furthermore, the Trustee is confirming that the amount of the alleged administrative expense is accurate. The Trustee believes that Movants’ motion will be resolved with a consent order prior to the hearing date and no appearance will be necessary.

Thank you for your attention to this matter.

Respectfully Submitted,
FLASTER/GREENBERG P.C.

/s/ Damien Nicholas Tancredi

Damien Nicholas Tancredi

CC: All parties of record (via CM/ECF filing)